

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CRUZ VALDIVIESO FIGUERA,

Case No.: 0:22-CV-61553-WPD

Plaintiff,

v.

ALL VIP CARE, INC.

Defendant.

_____ /

NOTICE OF COMPLIANCE WITH COURT ORDER

Defendant, ALL VIP CARE INC., by and through undersigned counsel, hereby files this Notice of Compliance pursuant to the Court's **Order Deferring Ruling on Motion to Withdraw as Counsel** [DE 211], and state as follows:

1. On February 20, 2025, Undersigned Counsel received the Court's Order [DE 211] via the Court's CM/ECF system.
2. Subsequently on February 20, 2025, Undersigned Counsel transmitted a copy of the Court's Order [DE 211] to Defendant, ALL VIP CARE, INC., via email at liz@allvipcare.com.
3. Accordingly, Undersigned Counsel has complied with the Court's directive to provide Defendant with a copy of the Order on or before **February 25, 2025**.
4. A copy of the transmittal email is attached hereto as **Exhibit "A."**

Respectfully Submitted,

/s/ Elizabeth P. Perez

15800 Pines Blvd., Suite 3210
Pembroke Pines, FL 33027

Telephone: (305) 709-0888
Email: elizabeth@plglawoffice.com
Florida Bar No.:0182461

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that the foregoing was electronically filed with the Clerk of the Court via CM/ECF on this 21st day of February 2025. We also certify that the foregoing was served on all counsel or parties of record on the attached Service List either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronic Notices of Filing.

/s/ Elizabeth P. Perez

Elizabeth P. Perez




Re: Order on Motion to Withdraw - Valdivieso

From Sebastian Suarez <paralegal@plglawoffice.com>

Date Thu 2/20/2025 5:56 PM

To Liz V. McKinnon (Work) <liz@allvipcare.com>

Cc Elizabeth Perez <elizabeth@plglawoffice.com>

 1 attachment (203 KB)

25.02.20 Order Deferring Motion to Withdraw.pdf;

In furtherance of my previous email:

We advise that you carefully read the Court's Order which is attached to this email, as there are time sensitive deadlines.

You previously instructed Ms. Perez to withdraw from the Case, and the Court would like to confirm whether you have any objection. As well, you have until March 6th to have new counsel enter the case, or the judge will order a Default Judgment against you. Please respond to this email acknowledging receipt and review of this email, the attached Court's Order, and confirm that you have no objection to Ms. Perez' withdrawal from this case.

I have attached the Order again for your reference.

Sebastian Suarez

Paralegal

PEREZ LEGAL GROUP

15800 Pines Blvd., Suite 3210 | Pembroke Pines, Florida 33027

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From: Sebastian Suarez

Sent: Thursday, February 20, 2025 5:26 PM

To: Liz V. McKinnon (Work) <liz@allvipcare.com>

EXHIBIT "A"

Cc: Elizabeth Perez <elizabeth@plglawoffice.com>

Subject: Order on Motion to Withdraw - Valdivieso

Good afternoon Liz,

Please see the Court's order on the Motion to Withdraw in the Valdivieso case.

Let me know if you have any questions.

Sebastian Suarez

Paralegal

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